

### Remarks

Claims 1, 3-7, 9-16, 18, and 20 are pending in the present application. Claims 1, 7, 14, 16, and 18 are currently amended. The Examiner has rejected claims 1-20 under 35 U.S.C. §102(e) over U.S. Patent No. 6,697,924 to Swank (hereinafter “Swank”).

#### **A. Remarks Regarding Rejection of Independent Claims 1, 7, 14, 16, 18, and 20**

Independent claims 1, 7, 14, 16, 18, and 20 have been rejected by the Examiner as being anticipated by Swank. Applicant respectfully submits that in order to establish a *prima facie* case of anticipation, “[t]he identical invention must be shown in as complete detail as is contained in the . . . claim” (*Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)), and that the elements must be arranged as required by the claim. (*In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990)). Furthermore, “A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987). With these threshold requirements in mind, Applicant submits a *prima facie* case of anticipation has not been established with respect to Swank.

In the specification of the present invention, an association module may be created to associate one or more application identifiers and one or more storage unit identifiers to form one or more associations. (Spec., [0004]) For each of these associations, assignments may be made such that each storage unit identified by a storage unit identifier is assigned to each host having the application identified by the associated application identifier. (Spec., [0006]) In this manner, access to a LUN need not be granted to *all* applications in a host computer, allowing for a more secure approach that enhances privacy for the storage device. (Spec., [0007]) Additionally, because logical units may be assigned to host computers that include specific

programs, this provides enhanced virtualization of the storage device. (Spec., [0008] and [0032]) The association module may contain a table such as table 140 in Figure 1 or table 460 in Figure 4 of the specification of the present invention. This table may be built using the method of Figure 2. In some embodiments, the association module may scan the table to identify LUNs associated with a node name (and possibly also a port name) included in a request, and the host computer may then access LUNs that have been associated with this node name (and port name) based on the contents of this table. (Spec., [0033]) Specifically, each of the independent claims of the present invention, as amended, require that the mapping table of the present invention includes one or more rows, with **each row** of the mapping table including a storage unit identifier (such as LUN) **and** an application identifier, each row of the mapping table forming an association of a storage unit and an application.

In contrast to the present invention, Swank fails to disclose a mapping table as required by the independent claims. The Examiner points to Figures 17 and 18 and col. 3 of Swank as teaching this claim element. (Office Action, p. 4) However, Swank fails to disclose a mapping table in which **each row** includes a storage unit identifier **and** an application identifier such that **each row** forms an association of a storage unit and an application. At best, the cited portion of col. 3 of Swank teaches the administrator or operation selection of a host icon and a LUN icon on a GUI display with the aid of selective activation of icons. (Swank, col. 3, lines 40-67) The GUI of Swank has icons representing SAN operations, and these icons are only activated when certain conditions are met. Additionally, there may be a topological, hierarchical, or enumerated *display* of component properties like LUN identities. (Swank, col. 3, lines 40-67) However, a GUI display of LUN identities does not teach a **mapping** table for forming an **association** between a storage unit and an application, nor does it teach that **each row**

of this table contains both a storage identifier and an application identifier. An enumerated display does not teach all of these requirements of the claims. Additionally, in Figures 17 and 18 of Swank, the displays shown fail to meet the requirements of the claims. Specifically, in Figure 17, the properties of a single LUN are shown, with a table showing rows containing host name, IP address, status, and operating system level. However, each row fails to contain both a storage identifier (like a LUN) and an application identifier, such that each row provides an association between a storage unit and an application. In Figure 18, the properties of a single host are shown, with a table showing rows containing accessible LUNs and their properties like capacity, vendor, product ID, revision, unit number, and status. However, each row again fails to contain both a storage ID and an application identifier, such that each row provides an association between a storage unit and an application. In Swank, the displays shown are either for a **single LUN** or a **single host**, thus, information regarding accessible LUNs or available hosts must be viewed **for each LUN or each host**, rather than in the convenient row-by-row format of the mapping table of the present invention, in which each row provides association information for a storage unit and an application. That is, in certain embodiments, the mapping table provides information for *all* the storage units and applications.

Because Swank fails to disclose a mapping table that includes one or more rows, with **each row** of the mapping table including a storage unit identifier (such as LUN) **and** an application identifier, each row of the mapping table forming an association of a storage unit and an application, a *prima facie* case of anticipation has not been established with Swank. As such, Swank fails to anticipate the independent claims.

#### **B. Dependent Claims 3-6, 9-13, 15, and 20**

The pending dependent claims will not be addressed individually, as these claims depend from otherwise allowable base claims.


**C. No Waiver.**

All of Applicants' arguments are without prejudice or disclaimer. Additionally, Applicants have merely discussed example distinctions from the cited reference. Other distinctions may exist, and Applicants reserve the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. By not responding to additional statements made by the Examiner, Applicants do not acquiesce to the Examiner's additional statements. The example distinctions discussed by Applicants are sufficient to overcome the anticipation rejections.

**Conclusion**

Applicants respectfully submit that pending claims 1, 3-7, 9-16, 18, and 20 are allowable and should be passed to issuance.

Respectfully submitted,



---

Roger Fulghum  
Registration No. 39,678

Baker Botts L.L.P.  
910 Louisiana  
One Shell Plaza  
Houston, Texas 77002-4995  
(713) 229-1707

Baker Botts Docket Number: 016295.1505

Date: February 4, 2008